

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, :
LOSARTAN, AND IRBESARTAN : HON. ROBERT B. KUGLER
PRODUCTS LIABILITY : HON. JOEL SCHNEIDER
LITIGATION :
: Civil No. 19-2875 (RBK/JS)
:

**NOTICE OF DEFENDANTS' MOTION TO RECONSIDER
MTD ORDER 1 AND MTD OPINION 1, OR, IN THE
ALTERNATIVE, FOR SECTION 1292(b) CERTIFICATION**

PLEASE TAKE NOTICE that on February 1, 2021, or as soon thereafter as counsel may be heard, Defendants, by and through lead counsel for all Defendants in the above-captioned action, shall move before the Honorable Robert B. Kugler, United States District Judge of the United States District Court for the District of New Jersey, for the entry of an Order granting Defendants' Motion to Reconsider MTD Order 1 and MTD Opinion 1, or, in the Alternative, for Section 1292(b) Certification.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon their Memorandum of Law in Support of the Motion submitted herewith, the Certification of Aaron Van Nostrand, Esq. together with exhibits, and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if this motion is opposed.

Dated: January 4, 2021

Respectfully submitted,

By: /s/ Lori G. Cohen

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